



**GENEVA STEEL**

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0004

September 9, 1994

Division of Oil, Gas and Mining  
Dept. of Natural Resources  
355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, UT 84180-1203

Attn: Wayne Hedberg

Dear Mr. Hedberg:

Included with this letter is the Updated Application for Revision and Amendment to Geneva's current Iron Mountain Reclamation Permit (M/021/008) for your review. This update was completed pursuant to your letter dated December 22, 1993. For ease of review, we have attached a copy of that letter and identified on the letter the location within the body of the application the change or item addressed.

Some items raised in your letter could not be addressed in the body of the application and are more appropriately addressed in this cover letter.

The entire text, with the exception of the Figures and Plates, should be replaced and maps inserted in the appropriate places in the previous submission.

PRIOR PERMITTED STATUS OF THE FUTURE MT. LION DUMP (M/021/003)

A question was raised as to whether what is currently being called the "Future Mt. Lion Dump Area" was ever formally approved by the Division. A review of the Division correspondence file indicates that it was. On or about October of 1976, USX submitted it's original application submission for, among other items, the Mountain Lion ore body and waste and the Homestake ore body and its associated waste. Following other correspondence, USX resubmitted a revised application on June 20, 1977. Pertinent references from this resubmission are as follows:

"The Mt. Lion ore body has an open pit mine... The waste material is almost all rock and is dumped nearby on undisturbed ground. In the future, some waste will be dumped on ground already disturbed by Utah International."

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"...(Homestake) waste is almost all rock and will be dumped nearby with some of it going on ground already disturbed by Utah International, Inc. and some of it going on undisturbed ground." (emphasis added)

On December 24, 1980, the Division requested an updated map showing "disturbance." On February 6, 1981, USX submitted a letter and an updated map showing these areas for approval, which identifies the proposed Homestake pit and a "proposed dump area" which is currently called the Future Mtn. Lion Dump. As appears on the map, the undisturbed area, (non-stippled on topo sheet) discussed in the body of the original submissions, is the Future Mtn. Lion Dump area.

In a Memo to File dated November 6, 1981, there is discussion of the dump "extending northward onto previously undisturbed land." On May 25, 1982, final approval of the plan was issued. It seems clear to us that the Homestake Pit and dump area and the Mt. Lion Pit and dump area, including the area currently designated as the Future Mt. Lion Dump (which also can include Homestake pit waste) were permitted and approved by the Division on May 25, 1982.

PRIOR VARIANCES ON THE UTAH INTERNATIONAL PERMIT (M/021/001)

In Section 12.2.3 (page 35) of the August 23, 1993 submission, four variances were identified as existing for the Utah International Site. The Division requested reference to the documents justifying or granting the variances listed on pages 35 and 37 of the revised plan. Page 37 contains a list of variances currently under request. Some of these requests were granted in the Division's letter of December 22, 1993. Page 35 contained variances granted under the Utah International Permit (M/021/001). Each Utah International variance and its supporting documentation as found in the Division's files is as follows:

1. Post mine use of roads:

The final approval document by DOGM dated August 17, 1978, required that only "unnecessary roads" be "scarified and seeded". The amendment to this plan for the Comstock area which incorporated reclamation standards on the original submission, was approved requiring only "(s)urface roads that are not used for continuing use" be reclaimed.



2. Revegetation standard:

After original submittal of the Comstock area amendment request on July 11, 1978, discussion was made of the lack of topsoil and general revegetation efforts in an Executive Summary from DOGM dated May 28, 1980 recognizing the fact that this was a pre-Act area. After approval of the amendment, DOGM granted a modification to the 70% revegetation standard in a letter dated October 13, 1991 which stated:

"Attempts at meeting revegetation standards will be taken into account if seventy percent achievement is not attainable as per M10(12)(3) and adequate efforts to achieve such are demonstrated by Utah International."

3. <sup>HIGHWAY ?</sup> Highway and drainage variance:

These variances (referred to by their previous rule numbers M-10(5) and M-10(8)) were granted and incorporated into the mining and reclamation plan in letters from DOGM dated June 7, 1978 and June 27, 1978. In the request to amend the plan by adding the Comstock area, the cover letter (dated July 11, 1978) indicated that the reclamation activities and requirements for this new area would be the same as those in the prior submittal. In the actual "Mining and Reclamation Permit Amendment" document dated May 9, 1980, all reclamation standards reference the standards of the prior approval "Mining and Reclamation Plan" dated June of 1977. The reclamation variances had already been deemed to be "a permanent and legal amendment to your mining and reclamation plan" by DOGM in their letter of June 27, 1978.

4. Post-mine use of plant site:

Again, the original permit was approved by DOGM requiring only that "unusable buildings will be removed" in the approval document dated August 17, 1978. The Comstock amendment merely incorporated this standard in its submission. Geneva would like to modify this variance to clearly identify it as a variance for a post-mine industrial site. This request is now contained in the body of the amendment in Section 12.2.3.



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LEAN ORE AND OVER BURDEN DUMP SLOPES

These slopes were already permitted for a 37° slope with a revegetation variance. No alteration to the prior permit requirement is requested.

COMSTOCK/MT. LION PIT HIGHWALL VARIANCE

This variance is not requested because it was already granted under previous permits. We apologize for this misunderstanding.

LONG TERM PUBLIC HEALTH AND SAFETY PROTECTION MEASURES AT THE MOUNTAIN LION/COMSTOCK PIT

A question was raised regarding this issue. A review of the Division files indicates that USX, in its original application, committed to fence around accessible mining operation areas (including the pit) and push a rick of waste approximately 5 feet high around the accessible edges of the pit. This was deemed acceptable in a "Memo to the File" by Division Geologist Brian Buck dated October 19, 1976. CF & I committed to place fences or berms along remaining highwalls on the Comstock pit in the Division approval document dated April 28, 1980. This practice is identified in Section 12.2 of the attached Revised Mining and Reclamation Permit Application.

COMSTOCK ACCESS ROAD AND IRON MOUNTAIN LIVESTOCK ROAD (POST MINE USE)

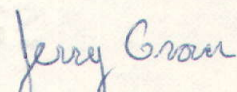
A question was raised about the post-mine road running from the south of the Ore Handling Area "ending at the Comstock Dump." In fact, a closer examination of the map will show that this road does not end at the Comstock Dump but, in fact, ties into an existing through road, which pre-existed any mining operation. This access road is important because it accesses Crystal Springs where ranchers maintain a livestock watering area. This road also accesses the upper portion of subdivisions which have been established along the road to the south of Geneva's property.



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The Iron Mountain Livestock Road will be used for purposes of livestock access as the principal post-mine activity will be grazing. It is the only road that accesses the southwest side of Iron Mountain.

Sincerely,

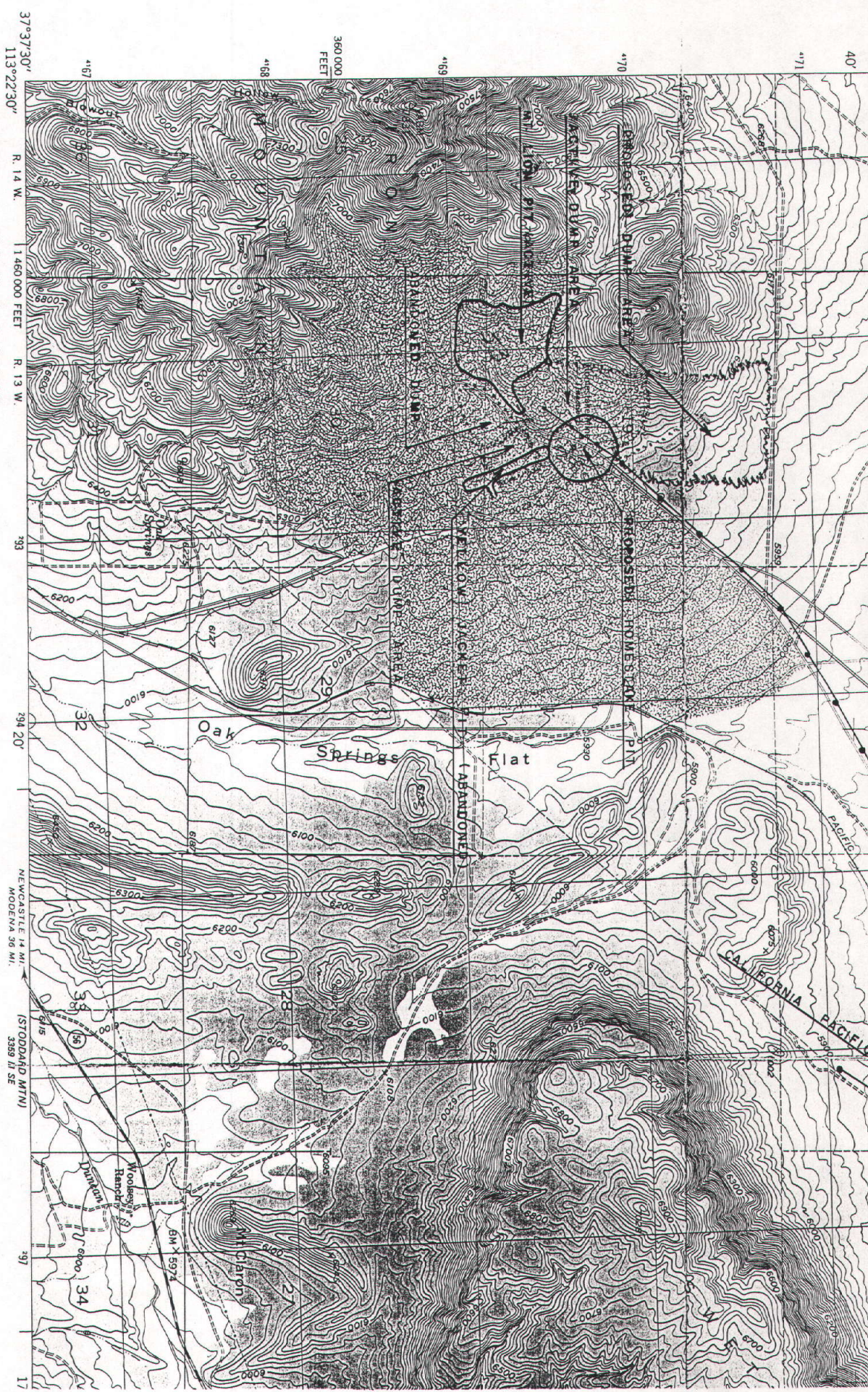


Jerry Grover  
Senior Environmental Engineer

JG/mr  
Enclosure

cc: Roy Benson w/o attachments  
K.C. Shaw w/o attachments  
Richard Clayton w/o attachments





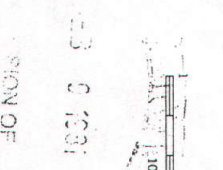
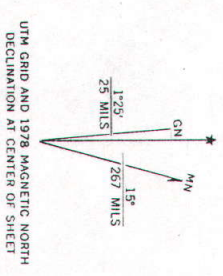
(PAGE RANCHED)  
33S II SW

37°37'30"  
113°22'30"

Mapped, edited, and published by the Geological Survey  
Control by USGS and NOS/NOAA

Topography from aerial photographs by multiplex methods  
Aerial photographs taken 1948, Field check 1950  
Polyconic projection, 1927 North American datum  
10,000-foot grid based on Utah coordinate system,  
south zone

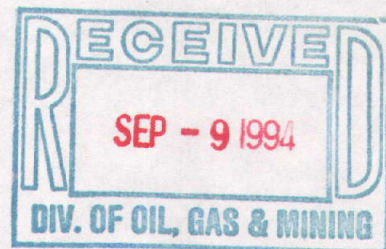
Dashed land lines indicate approximate location  
1000-meter Universal Transverse Mercator grid, zone 12  
Revisions shown in purple and recompilation of wood land areas  
compiled from aerial photographs taken 1976 and other source  
data. This information not field checked. Map edited 1978



CONTOUR INTERVAL 20 FEET  
NATIONAL GEODETIC VERTICAL DATUM OF 1929

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS  
FOR SALE BY U.S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225, OR RESTON, VIRGINIA 22092  
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST





REVISED

MINING AND RECLAMATION

PERMIT APPLICATION

(PRIOR PERMIT NO. M/021/008)

FOR THE

IRON MOUNTAIN MINING DISTRICT

NEAR CEDAR CITY, UTAH



**GENEVA STEEL**  
10 SOUTH GENEVA ROAD  
VINEYARD, UTAH 84058

August 18, 1993

THIS VERSION REPLACED  
THE AUG. 18, 1993 VERSION.